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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARTIN J. CASTELLANOS, an
individual;

Plaintiff,
v.

LESLIE ANN WOLL, an individual; EAN
HOLDINGS, LLC, a Foreign Limited
Liability Company; DOES 1 through 10,
inclusive; ROE BUSINESS ENTITIES 1
through 10, inclusive,

Defendants.

Case No. 2:25-cv-01064-CDS-MDC

**Stipulation and Order for Extension of
Time to Respond to Complaint (First
Request)**

Plaintiff and Federal Defendants, through their undersigned counsel, hereby
stipulate and jointly request that the court extend the due date for the Federal Defendants'
response to the Complaint by 30 days, or up to and including July 23, 2025.

Plaintiff filed his Complaint in the Eighth Judicial District Court, Clark County,
Nevada on or about March 7, 2025. (ECF No. 1-2, at 12.) On or about June 16th, 2025, the
United States of America, on behalf of the Department of the Air Force and Leslie Ann
Woll, filed a Notice of Removal under 28 U.S.C. §§ 1442(a)(1), 1446, and 2679(d)(2). (ECF
No. 1.) The due date for the United States' Answer in this case is June 23, 2025, or 7 days
after the Notice of Removal was filed. *See* Fed. R. Civ. P. 81(c)(2)(C).

Since receiving notice of the Complaint and Summons (ECF No. 1-2), Federal
Defendants have been diligently working on this case. The United States has determined
that at the time of the accident, Woll was acting within the scope of her federal
employment for purposes of respondeat superior and the Federal Torts Claims Act

(FTCA). *See* 28 U.S.C. § 1346(B). Accordingly, Plaintiff's exclusive remedy is against the United States under the FTCA. 28 U.S.C. § 2679(b)(1). However, an action against the United States for injury or loss of property or personal injury or death first requires the filing of an administrative claim with the proper federal agency. *See* 28 U.S.C. § 2675.

Undersigned counsel for Plaintiff conferred regarding this case, the need for an administrative claim, and the timing for a response. To allow the parties to determine and agree upon the next steps in pursuing an administrative claim and this action, the parties hereby agree to and request an extension of the due date for a response, up to and including July 23, 2025. This request is not sought for purposes of delay.

Respectfully submitted this 23rd day of June 2025.

RALPH A. SCHWARTZ, P.C.

SIGAL CHATTAH
United States Attorney

/s/ Ralph A. Schwartz
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/s/ Christian R. Ruiz
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IT IS SO ORDERED:



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: 6/24/2025